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Of Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF OREGON

In re) Case No. 11-35450-elp7
)
Jason Randall Gerdes,) MOTION FOR JOINT ADMINISTRATION AND
) SUBSTANTIVE CONSOLIDATION
Debtor.)

Jason Randall Gerdes, by and through his attorneys, Vanden Bos & Chapman, LLP, ("Jason") and Angela Fay Marie Gerdes, by and through her attorneys in Vanden Bos & Chapman, LLP, ("Angela") hereby move that In re Angela Fay Marie Gerdes, No. 10-35347-tmb7, and In re Jason Randall Gerdes, No. 11-35450-elp7, be jointly administered and substantively consolidated (the "Motion"). Angela and Jason further move that In re Angela Fay Marie Gerdes, No. 10-35347-tmb7 be designated as the Lead Case.

In support of this motion, Angela and Jason (collectively "Debtors") state the following:

1. Angela and Jason are husband and wife.
2. Angela filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. § 101, *et seq.*, on June 17, 2011.

3. Due to exigent circumstances caused by the threat of repossession of the debtors' vehicle, Angela filed a case on June 17, 2011. Jason was unable to sign bankruptcy schedules on June 17, 2011 because he was at work and was unable to gain release from his employer to attend the signing appointment. It would have been detrimental to his employment to leave work early in order to sign the necessary bankruptcy documents.
4. There is substantial identity between the assets, liabilities, and financial affairs of the Debtors; disentangling the Debtors' estates is impracticable and consolidation and joint administration of their estate would increase judicial efficiency. Debtors will consolidate assets, liabilities and financial affairs and will file Missing Documents in the lead case of Angela Fay Marie Gerdes (11-35347-tmb7).
5. Rule 1015 allows for joint administration if two or more petition are pending in the same court by a husband and wife. The substantial identity between the assets, liabilities, and financial affairs means there is little potential conflict of interest between creditors of different estates. Debtors have claimed the same exemptions.
6. Section 302(b) allows for consolidation after the Court's determination of the extent of consolidation. In the instant cases, the estates should be fully consolidated as there is a substantial identity between the assets, liabilities, and handling of financial

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affairs between the debtor spouses and harm will not result from the permitting of consolidation.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By:/s/Christopher N. Coyle
Christopher N. Coyle, OSB #073501
Of Attorneys for Debtor

In re Jason Randall Gerdes
Chapter 7 Bankruptcy Case No. 11-354500-elp7

CERTIFICATE - TRUE COPY

DATE: June 22, 2011

DOCUMENT: MOTION FOR JOINT ADMINISTRATION AND SUBSTANTIVE
CONSOLIDATION

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

Jason and Angela Gerdes
911 JQ Adams Street
Oregon City, OR 97045

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

The following were served electronically by the Court:

Rodolfo Camacho
U.S. Trustee
Ann K. Chapman

Dated: June 22, 2011

VANDEN BOS & CHAPMAN, LLP

By:/s/Christopher N. Coyle
Christopher N. Coyle, OSB #073501
Of Attorneys for Debtor